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To: REGION03.TAT (EPA9322)  
To: RRC (EPA9374)  
From: R.CARON (EPA93030) Delivered: Thu 26-July-90 14:23 EDT Sys  
163 (171)  
Subject: SHAFFER EQUIPMENT ADDITIONAL FUND REQUEST  
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SUBJECT: Additional Funding Request for the Shaffer Equipment  
Site, Minden, Fayette County, West Virginia

FROM: Stephen R. Wassersug, Director  
Hazardous Waste Management Division (3HW00)

TO: Donald R. Clay, Assistant Administrator  
Office of Solid Waste and Emergency Response (OS-100)

THRU: Henry L. Longest, II, Director  
  
Office of Emergency and Remedial Response (OS-200)

ATTN: Stephen Luftig, Director  
Emergency Response Division (OS-210)

## I. ISSUE

A ceiling increase of \$704790, for a new total of \$4,460,237 is being requested to continue and complete emergency removal actions at the Shaffer Equipment Site, Minden, Fayette County, West Virginia, to abate the human health threats posed by the existing polychlorinated biphenyls (PCBs) onsite.

## II. BACKGROUND

The Shaffer Equipment Site became a CERCLA Removal Project on December 26, 1984, under Acting Regional Administrator Thomas P. Eichler's \$175,000 activation. Several additional funding requests had been approved to raise the final total project costs to \$3,755,447. Site activities included rerouting underground water lines, site stabilization, onsite treatment of the PCB contaminated soils, removal of 4,735 tons of contaminated materials, and site restoration. A complete site history may be found in the Administrative record for this site. However, the Shaffer Equipment Company was an operating firm at that time.

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On December 10, 1987, all removal operations had been accomplished and the site was declared completed. Since then, the site and adjacent areas have been undergoing remedial investigation and a health survey (ATSDR). On March 20 and 21, 1990, NUS/FIT conducted a multimedia sampling at the site at the request of Region III EPA and ATSDR. The samples obtained by NUS/FIT indicated six soil sample locations that exceeded the 50 parts per million (ppm) removal action level limit set by TSCA.

The Removal Program was notified of these findings and an On-Scene Coordinator was assigned to investigate the NUS/FIT sampling to confirm these findings. Samples taken by TAT confirmed the results in all but one area. In general, the areas where removal actions were taken were found to be below the 50PPM action level. Areas immediately surrounding the building and areas where previous company activity occurred were found to be contaminated with PCB in excess of 50 PPM. The OSC is of the opinion that this contamination is new, as previous sampling of these areas in 1985 showed no levels of concern. EPA then performed a more extensive sampling to better define the contaminated areas. Analysis indicates that approximately one acre of property around the building and several scattered areas contain PCB levels above the action level of 50 ppm. The contamination is spotty and appears to be associated with building cleanout after the closure of Shaffer Equipment in 1988. In addition, one sample area appears to be very recent. Analysis of the chromatography indicates the PCB oil is not weathered. The site is currently not on the National Priorities List (NPL) because of the low scores it has received in the Hazard Ranking System (HRS).

An active citizen's group exists in the community. Their efforts have included seeking the assistance of Senator Rockefeller and Congressman Staggers. Their concerns are associated with the long term health impact in the community. ATSDR is actively assisting the state health department in the performance of a health survey. The OSC previously sought advice and guidance from ATSDR to determine risk based action levels for cleanup. A level of 50 PPM was selected. Contamination does exist in other areas of the community at levels far below 50 PPM and in all but one location below the levels suggested in the TSCA PCB Spill Cleanup Policy.

The region's pre-remedial program is actively performing a site investigation at this site.

Upon review of the latest sampling data, the OSC has recommended that any contamination found above the 50 PPM action level be removed in order to remain consistent with the risk based action levels already set for this site. This action memorandum is in support of this action

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### III. PROPOSED ACTIONS AND ESTIMATED COSTS

If approved, the additional funds will be used to complete cleanup activities necessary to abate the threat to public health and the environment. The proposed actions are as follows:

- \* Excavate contaminated soils to approximately one foot in depth.
- \* Remove soil from the site to an approved landfill. The materials will be landfilled because the levels of PCB present are not high enough that it is necessary to incinerate them and landfilling is the most cost effective solution.
- \* Sample to ensure the effectiveness of removal action.
- \* Backfill excavated areas with "clean" backfill.
- \* Secure the entire site from future access by installing a fence completely around the property.

### IV. SUMMARY OF COSTS

	Current Ceiling	Additional Funds	New Ceiling
Extramural Costs	\$3,451,205	\$578,000	\$4,029,205
ERCS Contractor (includes sub- contractor, disposal, and contingency)			
TAT	94,506	12,023	106,529
USCG	65,329		
Extramural Subtotal	<u>\$3,611,040</u>	<u>\$590,023</u>	<u>\$4,135,734</u>
Intramural Costs			
EPA Direct	52,149	10,248	62,397
EPA Indirect	92,258	16,016	108,274
Intramural Subtotal	<u>\$ 144,407</u>	<u>26,264</u>	<u>170,671</u>
15% Project Contingency		\$88,503	
TOTAL PROJECT CEILING	<u>\$3,755,447</u>	<u>\$704,790</u>	<u>\$4,460,237</u>

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V. RECOMMENDATION

Because the conditions at the Shaffer Equipment Site continue to meet the criteria for a removal action under Section 104(c) of CERCLA, as amended by SARA, and the criteria for continued response actions under the National Contingency Plan 300.415, I recommend the approval of a \$704,790 ceiling increase. Your approval will raise the total project ceiling to \$4,460,237, of which \$678,526 are for extramural cleanup contractor costs. Please show your approval or disapproval by signing below.

APPROVED \_\_\_\_\_

DATE \_\_\_\_\_

DISAPPROVED \_\_\_\_\_

DATE \_\_\_\_\_